

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Indictment No.
	:	07 Crim. 866 (JSR)
	:	
ANGEL PEREZ,	:	
CARMEN PATRON, and	:	<u>NOTICE OF MOTION</u>
MANUEL CONCEPCION,	:	
a/k/a/ "Santiago Figueroa,"	:	
	:	
Defendants.	:	

-----X

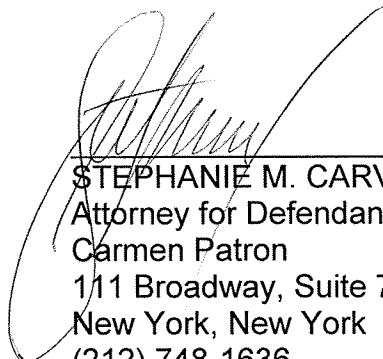
S I R S:

PLEASE TAKE NOTICE that upon the annexed affidavits of STEPHANIE M. CARVLIN, Esq., and CARMEN PATRON, the accompanying memorandum of law and all prior proceedings had herein, the undersigned counsel will move this Court, the Honorable Jed S. Rakoff, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time convenient to the Court, for the following relief: 1) an order suppressing physical evidence seized from Ms. Patron's residence by agents of the Drug Enforcement Administration and the Stratford, Connecticut Police Department on or about August 30, 2007, and 2) an ordering granting Mr. Patron any relief granted to her co-defendants that is relevant and beneficial to her.

This motion is made pursuant to Rule 12(b)(3) of the Federal Rules of Criminal Procedure. The ground for seeking suppression of the evidence is that it was obtained in violation of Ms. Patron's right under the Fourth Amendment to

the United States Constitution to be free from unreasonable searches and seizures.

Dated: New York, New York
October 30, 2007



STEPHANIE M. CARVLIN, Esq.
Attorney for Defendant
Carmen Patron
111 Broadway, Suite 701
New York, New York 10006
(212) 748-1636

TO: CLERK OF THE COURT
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

HON. JED S. RAKOFF
United States Courthouse
Southern District of New York
40 Foley Square
New York, New York, 10007

MARISSA MOLÉ, Esq.
Assistant United States Attorney
Office of the United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007